

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Cause No. 4:16CR528 AGF (PLC)
)	
)	
TODD BECKMAN,)	
)	
Defendant.)	

DEFENDANT TODD BECKMAN'S FIRST MOTION TO CONTINUE TRIAL SETTING

COMES NOW, Defendant, by and through counsel, and hereby requests this Honorable Court enter an order vacating the current trial setting of August 7, 2017. Defendant is requesting a continuance of forty-five (45) days. In support, Defendant states the following:

1. This case is currently set for trial on August 7, 2017. Defendants Todd Beckman, Blake Laubinger, Caleb Laubinger, and Kerry Roades are the remaining defendants in this case.

2. Undersigned counsel has contacted Assistant U.S. Attorney John Davis and counsel for Kerry Roades, regarding the instant motion, both parties agree that a continuance is necessary.

3. Defendant Beckman has been in communications with U.S. Attorney John Davis and there is a likelihood that there may be a resolution to this case without a trial, however a final plea agreement has yet to be reached.

4. Undersigned counsel is scheduled to begin a jury trial, on August 7, 2017, in Saint Louis County; *State of Missouri v. James Beck*, 14SL-CR02568.

5. Defendant Beckman has executed a speedy trial waiver and attached said waiver hereto. Defendant acknowledges that the delay caused by his motion to continue will not be considered in any speedy trial computation.

WHEREFORE, for the foregoing reasons, Defendant Todd Beckman does hereby request this Honorable Court enter an order vacating the current trial setting of August 7, 2017, and requests a delay of forty-five (45) days.

Respectfully submitted,

SINDEL NOBLE P.C.

/s/ TRAVIS L. NOBLE. JR.

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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of July, 2017, a copy of the foregoing **DEFENDANT TODD BECKMAN'S FIRST MOTION TO CONTINUE TRIAL SETTING** was filed electronically with the Clerk of the Court in the United States District Court, Eastern District of Missouri and to be served by the operation of the Court's electronic filing system upon all attorneys of record.

/s/ TRAVIS L. NOBLE JR.